

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

SCOTT TURNAGE, CORTEZ D. BROWN,  
DEONTAE TATE, JEREMY S. MELTON,  
ISSACCA POWELL, KEITH BURGESS,  
TRAVIS BOYD, TERRENCE DRAIN, and  
KIMBERLY ALLEN on behalf of themselves and  
all similarly situated persons,

Plaintiffs,

V.

BILL OLDHAM; FLOYD BONNER, JR.;  
ROBERT MOORE; KIRK FIELDS; CHARLENE  
MCGHEE; REGINALD HUBBARD; DEBRA  
HAMMONS; TIFFANY WARD; SHELBY  
COUNTY, TENNESSEE; TYLER  
TECHNOLOGIES, INC.; GLOBAL TEL\*LINK  
CORPORATION; SOFTWARE AG USA, INC.;  
SIERRA-CEDAR, INC.; SIERRA SYSTEMS  
GROUP, INC.; and TETRUS CORP.,

Defendants.

**Civil Action No. 2:16-cv-02907-SHM-  
tmp**

**(Hon. Judge Samuel H. Mays)**

**NOTICE TO TAKE THE DEPOSITION OF PAUL ZIGLER**

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-and-

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Please take notice that pursuant to Rule 30(a)(1) of the Federal Rules of Civil Procedure, Plaintiffs Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy S. Melton, Issacca Powell, Keith Burgess, Travis Boyd, Terrence Drain, and Kimberly Allen will take the deposition of Paul Zigler at the law offices of BLACK McLAREN JONES RYLAND & GRIFFEE, P.C., 530 Oak Court Drive, Suite 360, Memphis Tennessee 38117, commencing on **March 18, 2020 at 9:30 a.m.**, Central Standard Time, and continuing thereafter from hour to hour and day to day until complete.

The deposition will be taken on behalf of Plaintiffs for the purposes of discovery, use as evidence, preservation of testimony, and all other purposes authorized by law and will be recorded by a certified court reporter, who will record the deposition by means of stenograph and/or audio recordings. The deposition may also be recorded by video or other visual and electronic means.

Respectfully submitted,

s/ William E. Routt

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 27th day of January, 2020, a true and correct copy of the foregoing pleading has been filed electronically with the Court's Electronic Case Filing System. Pursuant to the Court's ECF System, the following parties listed below are filing users who will receive notice of the foregoing document's filing:

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